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6 Attorneys for Defendant  
7 KEURIG DR PEPPER INC.

8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**

10  
11 KARINA NUNEZ, an individual,

12 Plaintiff,

13 v.

14 KEURIG DR. PEPPER, INC., a  
15 Delaware Corporation; and DOES 1  
through 50, inclusive,

16 Defendant.  
17

Case No. 5:19-cv-00010

**DECLARATION OF ERKAN CETIN IN  
SUPPORT OF DEFENDANT KEURIG  
DR PEPPER INC.'S NOTICE OF  
REMOVAL TO THE UNITED STATES  
DISTRICT COURT**

Complaint Filed: November 29, 2018  
Trial Date: None

**DECLARATION OF ERKAN CETIN**

I, Erkan Cetin, hereby declare and state as follows:

1. I am employed by defendant Keurig Dr Pepper Inc. (“KDP”) as a Human Resources Manager. In this position, I have access to and am familiar with employee personnel and payroll records for employees of KDP and its subsidiaries, including Motts LLP (“Motts”). I am familiar with the basic operations and corporate structure of KDP and Motts. I make this declaration based on my personal knowledge and my review of documents and records in the files of KDP and Motts. If called to testify as a witness, I could competently testify thereto.

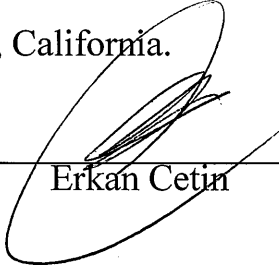
2. On approximately July 9, 2018, Dr Pepper Snapple Group, Inc. (“DPSG”) changed its name to KDP. KDP is now, and has been since before November 2018, a Delaware corporation, with its principal places of business in the states of Texas and Massachusetts. The majority of KDP’s executive and administrative functions take place in Plano, Texas and/or Burlington, Massachusetts. All of KDP’s executives have offices in, and regularly work from, one of these two locations. The functions performed at KDP’s Texas and Massachusetts locations include the activities of all of its high-level management team, and the majority of its domestic administrative functions, including payroll, accounting, purchasing, marketing, human resources and information systems. All of KDP’s company-wide policies and procedures are formulated by its executives in either Plano, Texas or Burlington, Massachusetts.

3. Plaintiff Karina Nunez was employed by Motts. Ms. Nunez has never been employed by KDP. As a Human Resources Manager, I interface with various Human Resources employees who regularly manage the personnel and payroll records. The personnel and payroll records are kept in the ordinary course of business.

4. At my instruction, a Human Resources employee accessed and secured certain of Ms. Nunez’s personnel and payroll records, which I have reviewed.

1 Ms. Nunez's personnel and payroll records show that, throughout her employment  
2 with Motts, Ms. Nunez listed her home address in California as her residence for the  
3 purposes of her personnel file, payroll checks, and tax withholdings. Based on  
4 Ms. Nunez's pay records, Ms. Nunez was a full-time employee, working  
5 approximately 40 hours per week, and earned \$22.47 per hour as of July 2018.

6 I declare under penalty of perjury under the laws of the United States of  
7 America that the foregoing is true and correct, and this declaration was executed on  
8 the 31<sup>st</sup> day of December, 2018, at Los Angeles, California.

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11 Erkan Cetin  
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